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FEDERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY

July 1, 1993

The Honorable Donna R. Searcy, Secretary Federal Communications Commission 1919 M Street, N.W., Room 222 Washington, D.C. 20554

ATTN:

ROBERT S. YOUNG, IR.

LINDSAY YOUNG
ROBERT S. MARQUIS

ROBERT S. STONE

MARK K. WILLIAMS

IANZE C. PORTER

R. SCOTT ELMORE TAMMY KAOUSIAS BENÉT S. THEISS

J. CHRISTOPHER KIRK

GREGORY E. ERICKSON

Allocations Branch

Policy and Rules Division

Re:

Amendment of FM Table of Allotments

(Corydon, Indiana)

Dear Ms. Searcy:

Enclosed please find an original and four copies of a Petition for Rulemaking, filed herewith on behalf of Harrison County Broadcasting Company, Inc., permittee of a construction permit for a new FM station at Corydon, Indiana (File No. BPH-860221MT). As noted therein, the Petition requests the substitution of FM Channel 299B for Channel 299B1 at Corydon. Also enclosed is an additional copy of the Petition which we would appreciate your returning to the undersigned in the enclosed postage paid, self-addressed envelope after it has been date-stamped by your office.

Should you or any members of your staff have questions concerning the enclosed, please contact the undersigned for clarification. Thank you for your cooperation in this matter.

Sincerely,

McCampbell & Young, P.C.

Robert S. Stone

Counsel to Harrison County Broadcasting Company

RSS/dlb Enclosures

cc: Harrison County Broadcasting Company, Inc.

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JUL - 2 1993

Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY

In the Matter of)	
Amendment of Section 73.202(b) Table of Allotments, FM Broadcast Stations. (Corydon, Indiana))	MM Docket No

To: Chief, Allocations Branch

PETITION FOR RULEMAKING

Harrison County Broadcasting Company, permittee of a construction permit for a new FM station at Corydon, Indiana (File No. BPH-860221MT) ("HCBC" or "Petitioner"), by its attorneys, and pursuant to § 1.420(g)(3) of the Commission's rules, hereby respectfully submits its Petition for Rulemaking, which seeks an amendment to the Commission's Table of FM Allotments, found in § 73.202(b) of the Commission's rules, so as to substitute FM Channel 299B for FM Channel 299B1 at Corydon, Indiana. In support whereof, the following is shown:

1. As noted above, HCBC currently serves as permittee of a construction permit for a new FM station at Corydon, Indiana, authorized to operate on FM Channel 299B1 at Corydon, Indiana. The channel requested by HCBC as substitution for its presently assigned channel represents a mutually exclusive higher class co-channel allotment, thus requiring the deletion of FM Channel 299B1. Consistent with § 1.420(g)(3) of the Commission's rules, the Commission may modify the construction permit of HCBC for the operation of the station on the requested upgraded channel during the course of the instant rulemaking. To that end, HCBC hereby sets forth its present and ongoing commitment to submit a minor change construction permit application promptly following substitution of FM Channel 299B for FM Channel 299B1

at Corydon, Indiana, so as to provide for operation with maximum facilities for a Class B FM station from a transmitter site which would meet all mileage separation requirements of the Commission's rules as well as all other rules governing the operation of such a facility of FM Channel 299B. Upon grant of its Petition for Rulemaking and application for modification of construction permit, HCBC hereby commits to prompt construction and commencement of operations of its station on FM Channel 299B.

- 2. This Petition is filed based upon the Commission's letter to petitioner dated June 16, 1993, a copy of which is attached. Therein, the Chief, FM Branch, determined that an upgrade from 299B1 to 299B for Corydon, Indiana must be sought by means of a Petition for Rulemaking, in light of the grant of HCBC's construction permit application on September 8, 1992, which reflected Class B1 facilities. Citing the Commission's action in Revision of Section 73.3573(a)(1) of the Commission's Rules Concerning the Lower Classification of an FM Allotment, 4 FCC Rcd. 2413 (1989), the FM Branch determined that the instant Petition is necessary. Thus, while HCBC may eventually challenge the FM Branch's determination, HCBC wishes to preserve its ability to operate as a full Class B facility by submission of the instant Petition. See Conflicts Between Applications and Petitions for Rulemaking to Amend the FM Table of Allotments, 7 FCC Rcd. 4917 (1992).
- 3. In further support of the instant request, the Commission's attention is directed to HCBC's technical feasibility study attached hereto. Based upon the reference geographic coordinates set forth therein, operation on FM Channel 299B would comply with all mileage

The FM Branch's June 16, 1993 letter does not address the fact that a Petition for Reconsideration was pending before the Commission on April 30, 1993, the date HCBC's construction permit modification application was filed, which HCBC believes prevented the Commission's September 8, 1992 grant of HCBC's application from becoming "final." HCBC is now investigating the possibility of seeking reconsideration of the Commission's June 16, 1993 dismissal of its modification application.

separation requirements and all rules governing principal community coverage and other technical requirements with respect to Corydon, Indiana, HCBC's community of license.²

4. Favorable action on the instant request would allow HCBC to increase

service to the community of Corydon and surrounding areas. Thus, the allotment of Channel

299B to Corydon would further the goals underlying the Commission's decision to permit co-

channel "upgrades" without accepting competing applications. Specifically, grant of HCBC's

request would promote spectrum efficiency and would be consistent with the Commission's

policy of encouraging licensees to improve their facilities. See, Report and Order in MM Docket

No. 85-313, 60 R.R.2d 114 (1986). Accordingly, favorable action by the Commission on the

instant Petition would be consistent with its own rules of substance and procedure, non-

burdensome for other licensees of the Commission, and in furtherance of the public interest,

convenience, and necessity.

WHEREFORE, premises considered, Harrison County Broadcasting Company, Inc.

respectfully requests the Commission to substitute FM Channel 299B for Channel 299B1 at

Corydon, Indiana, and to modify the construction permit of HCBC to allow operation as

requested herein.

Respectfully submitted,

HARRISON COUNTY BROADCASTING

COMPANY, INC.

McCampbell & Young, P.C., Its Attorneys

Rv

Robert S. Stone

McCAMPBELL & YOUNG, P.C.

2021 Plaza Tower Post Office Box 550

Knoxville, TN 37901-0550

(615) 637-1440

July 1, 1993

² HCBC's technical feasibility study is actually the engineering taken from its construction permit application (BPH-860221MT), before it was amended to reflect Class B1 facilities from a new transmitter site. The information nevertheless confirms the feasibility of FM Channel 299B operating at Corydon.

FEDERAL COMMUNICATIONS COMMISSION WASHINGTON, DC 20554

"JUN 1 6 1993

IN REPLY REFER TO: 1800B3-ESR

Deborah M. Poindexter Harrison County Broadcasting Company, Inc. 10405 Victoria Drive, #1 Knoxville, TN 37922

In Re:

NEW(FM), Corydon, IN Harrison County Broadcasting

Company, Inc. BPH-860221MT BMPH-930430IG

Dear Ms. Poindexter:

This letter is in reference to (i) construction permit BPH-860221MT which was granted by Order in MM Docket 87-559, released September 8, 1992 and (ii) application BMPH-930430IG filed to modify that construction permit.

Construction permit application BPH-860221MT was filed on February 21, 1986 for the allotment on channel 299B in Corydon, IN. However, the application, as granted, specified only Class B1 facilities. On April 30, 1993 you filed application BMPH-930430IG to modify the construction permit to specify class B facilities as originally allotted in Corydon, IN.

Although construction permit BPH-860221MT has not been issued, the grant of the construction permit permanently downgraded the Corydon, Indiana allotment to Class B1 by operation of law. The subsequent issuance of the construction permit is merely a ministerial act and does not allow for further modifications. Consequently, any attempt to upgrade the allotment to Class B will require a request for upgrade via a petition for rulemaking. Accordingly, application BMPH-930430IG is unacceptable for filing and will be dismissed.

¹ See the <u>Report and Order</u> in MM Docket 88-118, 4 FCC Rcd 2413, 54 Fed. Reg. 11953

Your attorney states that the Commission recently granted an application for Radio Station WKXD(FM), Monterey, Tennessee which sought a similar upgrade (BPH-920117IB). A review of WKXD(FM)'s file reveals that the Monterey, TN allotment was upgraded from Channel 296A to 295C2 in the Report and Order in Docket No. 86-512. However, on November 18, 1987 an Application for Review was filed in that Docket. Although the Application for Review did not stay the effectiveness of the Report and Order, it rendered that action not final. During the pendency of the Application for Review, WKXD(FM) filed application BPH-880309IB specifying Class C3 facilities. This application was granted on July 5, 1990.² Had the allotment proceeding been final, grant of this application would have, by operation of law, downgraded the Monterey, TN allotment to Class C3. However, because the proceeding was not final at that time, the allotment could not be downgraded. Because WKXD(FM) filed it's application BPH-920117IB, to specify Class C2 facilities on January 17, 1992, before the allotment proceeding became final, the pendency of that application precluded the downgrading of the allotment upon finality. The allotment proceeding became final upon expiration of the appeal period following release of the Memorandum Opinion and Order in Docket No. 86-512 on February 25, 1992. Therefore, the circumstances involved in the WKXD(FM) case, where the "upgrade" application was filed before the allotment proceeding became final, is clearly distinguishable from the instant case, where the upgrade application was filed after the channel had been automatically downgraded, by operation of law, upon grant of a lesser-graded permit.

In regard to construction permit BPH-860221MT, pursuant to OST Bulletin No. 65, October 1985, entitled "Evaluating Compliance with FCC-Specified Guidelines for Human Exposure to Radiofrequency Radiation," when persons have access to the site, the transmitter power must be reduced or completely eliminated in order to comply with FCC guidelines. Accordingly, construction permit BPH-860221MT will be issued with the following condition:

The permittee/licensee in coordination with other users of the site must reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency radiation in excess of FCC guidelines.

In addition, your antenna will be mounted on the same tower as the booster antenna for WGZB-FM. Since your antenna will be mounted above WGZB-FM's booster antenna, there is a possibility that the proposed FM antenna and transmission line will disrupt the directional pattern of the booster. Therefore, your construction permit will be issued with the following condition:

The Permittee must submit a statement from the manufacturer of WGZB-FM's booster antenna verifying that the permittee's transmission line will have no adverse effect on the booster's directional antenna pattern. This statement must be filed along with FCC Form 302 application for license.

² License application BLH-911223KH was filed on December 23, 1991 to cover this construction permit.

In light of the above, application BMPH-930430IG IS HEREBY DISMISSED. This action is being taken pursuant to 47 C.F.R. § 0.283 of the Commission's rules. Please note that construction permit BPH-860221MT will be issued under separate cover.

Sincerely,

Denni Williams

Dennis Williams Chief, FM Branch Audio Services Division Mass Media Bureau

cc: McCampbell & Young Electronic Laboratories, Inc.

I, Kenneth H. Larkin, Jr., do hereby certify under penalty of perjury;

That my qualifications in telecommunications matters are of record before the Federal Communications Commission having been presented and accepted upon many occasions in the past;

That I am a consultant with the firm of Hairston, Baxter and Larkin at Nashville, Tennessee specializing in technical topics pertaining to the broadcast industry and the associated RF transmission systems;

That I have been retained by Harrison County Broadcasting Company to perform certain technical studies and prepare this report of same;

That the accompanying technical report and exhibits were prepared by me personally or under my immediate personal supervision and that all information presented therein is true and correct of my own knowledge and belief.

Kenneth H. Larkin, Jr.

Executed on January 25, 1988

INTRODUCTION

This report and the accompanying technical exhibits are included as part of an amendment to the pending application of Harrison County Broadcasting Company (BPH-860221MT), applicant seeking a construction permit for a new Commercial FM Broadcast Station to operate at Corydon, Indiana.

The applicant seeks use of FM Channel 299B, 107.7 MHz, with 50.0 kW, effective radiated power (ERP) and 150 meters (492 feet) antenna height above average terrain (HAAT).

DISCUSSION

The proposed transmitter site has been selected to meet all applicable mileage separation requirements of the Commission's Rules. Accompanying Exhibit E-7 is a study confirming the specific separations and clearances involved.

In order to accurately establish the service contours for the proposed operation, the methods set forth in the Commission's Rules were employed. The average terrain elevation of the eight cardinal radials and a supplemental radial through the proposed community of license were computer-generated using the elevations from the N.G.D.C. 30-second topographic data file. The data were processed for intermediate points along each radial using linear interpolation techniques, as required.

Using the terrain data as outlined above, and a computer program emulating the applicable curves of the Commission's Rules, the distances to the relevant service contours on each radial were accurately computed. The resulting contours are

shown in map form at appropriate scale as accompanying Exhibit E2, which also confirms that the 3.16 mV/m contour proposed encompasses the entire community of license, as required.

The population receiving service was determined by use of the 1980 U.S. Census Final Count. After projecting the contour on the appropriate census map, populations of the included minor civil divisions were accumulated. When a division fell partly within and partly outside the contour, its population was assumed to be uniformly distributed and the population receiving service was assumed to be proportional to the area receiving service. Where identifiable communities appeared within the divisions, they were appropriately and independently treated.

Coordinates and site elevation for the proposed operation were taken from the Corydon West, Indiana U.S.G.S. 7.5-minute topographic quadrangle (1962, photorevised 1981), a portion of which is provided as Exhibit E-5. In addition, a reduction of the entire quadrangle has been provided for the Commission's Staff in compliance with the current-policy regarding site maps.

The distance to the 115 dbu "blanketing contour" is 2.79 kM (1.73 miles), as calculated in accordance with Section 73.318(a) of the Commission's Rules. The applicant recognizes and accepts the responsibility to investigate and attempt to resolve interference complaints within the blanketing contour caused by the proposed operation as outlined in Section 73.318.

Section 1.1307 of the Commission's Rules details actions which may have a significant environmental effect for which environmental assessments (EAs) must be prepared. It has been

determined that the instant proposal should be excluded from environmental processing.

More specifically, it has been determined that the proposed facility would not be located in an officially designated wilderness area or in an officially designated wildlife preserve. The facility will have no affect on districts, sites, buildings, structures or objects significant in American History, architecture, archeology or culture, that are listed in the National Register of Historic Places or are eligible for listing.

The proposed facility is not located in a flood plain nor will construction involve significant changes in surface features.

During preparation of this proposal, attention has been given to the National Environmental Policy Act of 1969 (NEPA), 42 U.S.C. Sections 4321-4361 and to the Commission's Report and Order in General Docket Number 79-144, 100 F.C.C. 2d 543 (1985). The proposed antenna radiation conter above ground far exceeds the minimum recommended height found in OST Bulletin Number 65, "Evaluating Compliance with FCC-Specified Guidelines for Human Exposure to Radio Frequency Radiation."

The applicant assumes that this proposal would create no significant effect on the human environment with regard to exposure to the general public.

The Federal Aviation Administration has been advised of the proposed construction on FAA Form 7460-1, a copy of which is attached to this application.

CONCLUSION

Based on the studies reported in this matter, and the accompanying technical exhibits, we trust that this proposal complies with the current applicable requirements of the Commission's Rules and Policies. The following figures are submitted in response to specific paragraphs of FCC Form 301, section V-B as revised October, 1986. If any additional information is needed in connection with this matter, please do not hesitate to contact this office.

TABLE I
HARRISON COUNTY BROADCASTING COMPANY
PROPOSED SERVICE CONTOURS
JANUARY 1988 AMENDMENT
TABULATION OF TV/FN CONTOUR CALCULATIONS ON CHANNEL 299

AZIMUTH	ERP, KW.	HAAT (M)	3.16/50%	1/50%
0	50	135	31.22	49.952
45	50	151	32.504	51.998
90	50	135	31.22	49.952
135	50	142	31.736	50.85
180	50	147	32.105	51.489
225	50	175	35.171	55.015
270	50	176	35.282	55.139
315	50	137	31.366	50.21
68	50	134	31.146	49.824

AREAS, Sq. Km. : 3341.6 8450.5

OVERALL HEIGHT ABOVE AVERAGE TERRAIN = 149.75 (M)

ALL HEIGHTS IN METERS. ALL CONTOUR DISTANCES IN KILOMETERS.

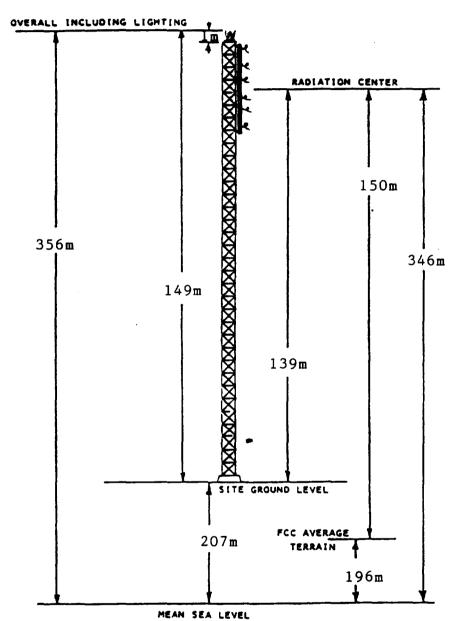
ALL CONTOURS IN MY/M AS DETERMINED BY BIVARIATE INTERPOLATION USING VALUES FROM APPROPRIATE FCC F(50,50) AND F(50,10) CURVES.

FM BLANKETING CONTOUR 115 dBu = 1.73 MILES, 2.79 KM. CALCULATED PURSUANT TO RER 73.318(a) FOR MAXIMUM ERP.

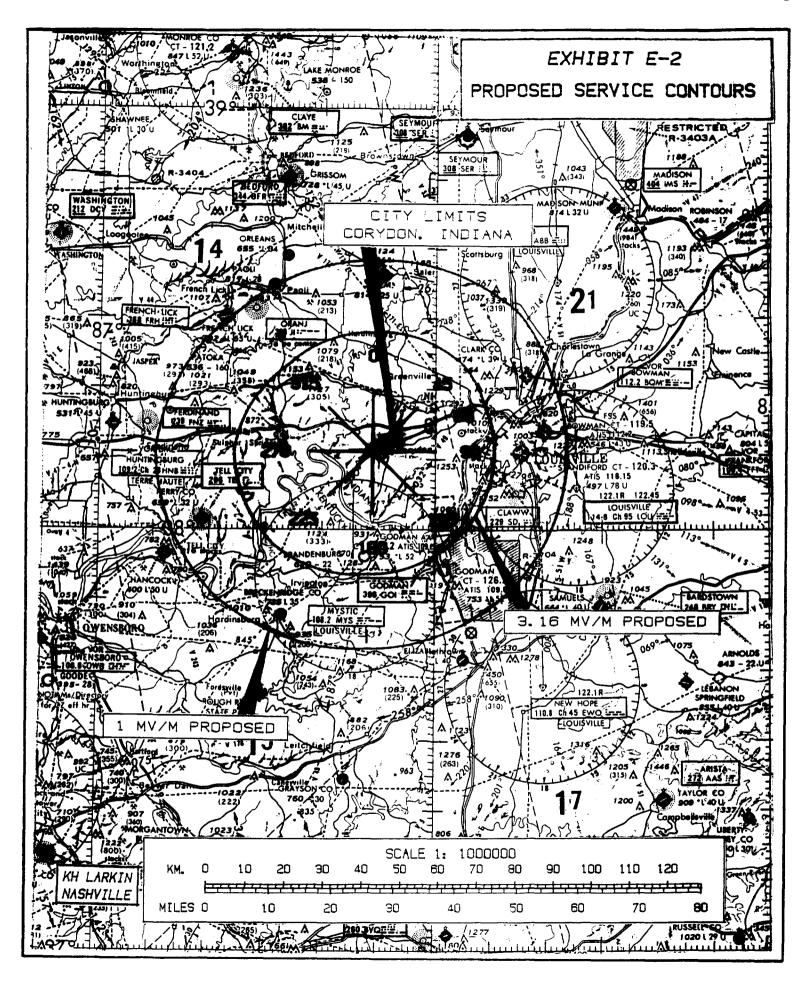
EXHIBIT E-1

HARRISON COUNTY BROADCASTING COMPANY

ANTENNA VERTICAL SKETCH



MARKING AND LIGHTING TO FAA SPECIFICATIONS
M=METERS
NOT TO SCALE



TERRAIN AVERAGING PROGRAM BASED ON NGDC 30 SECOND DATABASE

PROJECT TITLE: EXHIBIT E-3

N LAT: 381130 W LNG: 861132

BEARING DEG.	2-10 MI. METERS	ELEVATION FEET
0	211	691
45	195	640
90	211	691
135	204	668
180	199	652
225	171	562
270	170	559
315	209	686
68	212	697
AVERAGE OF 8:	196	644

EXHIBIT E-4 FIGURE 1
HARRISON COUNTY BROADCASTING CO.
TABULATION OF TERRAIN DATA

(englis	h units	s)	TABUL	AHIUN L	JE IERRA.	IN DATA		
DIST	o	45	90	135	180	225	270	31 5
0	679	679	679	679	679	679	679	679
. 1	501	497	492	493	4 76	506	511	508
	506	504	492	498	496	514	525	516
.2 .3	510	514	492	507	495	521	540	520
. 4	515	526	492	519	495	526	554	520
.5	519	541	494	535	495	531	563	517
. 6	535	558	509	555	497	533	571	510
.7	586	575	523	579	508	526	578	520
.8	636	572	538	601	518	515	585	534
. 9	686	563	552	613	529	510	599	573
1	736	557、	562	623	540	504	635	615
1.1	787	553	570	633	550	499	671	655
1.2	801	552	577	643	565	494	707	694
1.3	779	553	584	654	584	493	744	727
1.4	758	564	589	656	602	489	739	750
1.5	737	577	575	656	621	478	718	763
1.6	715	588	560	656	640	459	696	768
1.7	694	596	546	656	658	453	674	760
1.8	696	601	531	656	657	451	654	755
1.9	706	604	545	656	650	450	639	754
2	716	603	581	657	643	463	625	753
2.1	726	600	617	660	636	474	610	760
2.2	736	598	654	665	628	482	596	775
2.3	746	598	687	670	621	488	613	797
2.4	741	599	682	677	615	492	649	827
2.5	736	602	674	684	609	500	686	830
2.6	731	604	667	689	603 507	519	722 755	789 741
2.7 2.8	726 721	623	660	687 405	597 591	534 541	755 762	694
2.9	711	640 656	656 656	685 680 .	. 586	540	770	64 6
2.7 3	689	998 939	656	675	588	532	777	5 78
3.1	667	678	656	668	589	517	784	551
3.2	645	686	656	661	590	500	771	510
3.3	623	687	656	659	591	497	742	496
3.4	601	684	656	664	592	500	713	497
3.5	599	683	656	669		504	485	500
3.6	615	683	656	674	651	510	657	505
3.7	631	684	659	679	689	517	678	514
3.8	647	686	666	584	727	524	700	524
3.9	663	689	674	689	765	556	722	517
4	679	683	681	691	803	592	743	507
4.1	680	678	688	688	799	632	751	499
4.2	676	673	683	686	783	664	744	505
4.3	673	671	675	686	767	689	737	519
4.4	669	671	668	686	751	704	729	540
4.5	666	674	661	688	735	692	722	574
4.6	663	667	656	689	719	661	694	615
4.7	666	656	656	689	696	629	665	655
4.8	670	645	656	689	674	595	636	694
4.9	673	634	656	689		562	608	723
5	677	625	656	688	629	542	597	729

EXHIBIT E-4 FIGURE 1 HARRISON COUNTY BROADCASTING CO. TABULATION OF TERRAIN DATA (continued)

DIST	٥	45	90	135	180	225	270	31 5
5.1	680	618	65 6	688	607	536	611	736
5.2	680	616	656	689	594	553	625	730
5.3	669	618	656	689	604	562	640	726
5.4	659	618	656	689	615	564	654	727
5.5	649	615	658	689	626	558	663	732
5.6	638	610	665	689	636	545	670	740
5.7	628	602	673	689	647	525	677	748
5.8	636	592	680	685	646	495	684	725
5.9	658	592	687	677	637	465	674	709
6	681	594	678	671	627	441	631	700
6.1	704	598	664	665	617	421	587	69 8
6.2	727	60 3	6 49	661	607	407	544	704
6.3	750	609	635	658	597	397	500	718
6.4	742	617	625	657	600	400	475	731
6.5	725	626	632	558	606	427	453	728
6.6	70 9	628	639	663	612	449	431	724
6.7	693	631	647	666	518	470	409	723
6.8	676	635	654	667	624	487	394	724
6.9	661	641	661	668	630	502	394	727
7	660	648	668	6 67	641	515	394	733
7.1	660	656	675	664	651	540	394	735
7.2	659	661	683	638	661	563	394	736
フ・ゴ	659	666	690	606	671	582	410	737
7.4	659	668	697	578	682	607	431	743
7.5	660	671	704	561	692	636	453	749
7.6	665	677	712	554	704	669	475	753
7.7	671	685	719	557	716	692	488	753
7.8	676	685	726	579	728	694	466	752
7.9	681	677	733	604	740	6 9 0	444	751
8	687	666	741	040	/31	682	423	752
8.1	690	65 3	748	640	751	669	401	754
8.2	691	644	755 755	650	740	662	394	758
8.3	692	641	755	659	730	663	394	761 757
8.4	693 404	646	755 755	667 4 71	719	658 747	394	753
8.5	694	652 451	755 755	671	708	647	394	744
8.6 8.7	6 95 700	651 645	755 755	675 479	698 681	630 606	3 95 402	733 722
8.8	704	632	755 755	679 407		576	402	709
8.9	70 4 709	613	755 755	683 687	664 646	540	416	695
9	714	599	755	687 689	629	535	424	696
9.1	719	508 508	755	689	611	551	427	705
9.2	725	618	755 755	68 9	595	567	427	711
9.3	726 736	623	755	689	594	583	427	712
9.4	747	623	755	689	593	599	427	710
9.5	758	617	755	689	593	615	426	703
9.6	769	607	758	687 689	573 572	630 630	419	694
9.7	780	600	765	68 9	591	636	412	685
9.8	791	613	703 772	690	590	631	404	683 684
9.9	802	628	780	693	590	617	3 9 7	693
10	813	642	787	699	589	506	413	704
		ser I day	,,	- · · · · ·	<i>'</i>			,

EXHIBIT E-4 FIGURE 2 HARRISON COUNTY BROADCASTING COMPANY TABULATION OF SUPPLEMENTAL RADIAL

DIST	68	٥	O	٥	O	0	O	0
0	679	0	0	0	0	0	0	0
. 1	495	0	0	O.	O	0	0	Q
.2	499	0	0	0	0	0	O	0
.3	506	0	0	0	O	0	O	0
. 4	514	0	0	0	0	0	0	0
.5	523	0	0	0	0	O	0	0
. 6	531	0	0	0	O	O.	0	0
.7	534	0	O	O	0	0	0	O
.8	532	0	0	0	O	Q	0	0
.9	526	0	O	O	0	0	O.	0
1	516	0	O	O	0	О	0	0
1.1	517	O	0	O	O	O	0	0
1.2	519	0	0	0	0	O	0	0
1.3	522	O	0	0	Q	0	Ŏ.	0
1.4	524	0	0	0	Ō	O	0	0
1.5	526	0	0	0	0	0	0	0
1.6	540	0	0	0	O .	0	0	0
1.7	553	O	0	0	0	0	0	O
1.8	563	0	0	O	0	0	O	0
1.9	569	0	O	O	0	0	0	0
2	570	•	0	0	0	0	0	0
2.1	560	O	O	0	O	O	O	0
2.2	552	0	0	0	0	O	0	0
2.3	547	O	0	0	0	0	Q	O
2.4	545	0	0	0	O	0	0	0
2.5	547	O	0	O	O	0	0	0
2.6	555	0	0	O	O	0	0	0
2.7	556	О	O	0	0	0	0	0
2.8	553	O	O	0	0	0	0	0
2.9	544	O	0	O 💂	0	0	0	0
3	534	0	O	0	0	0	0	0
3.1	535	0	0	0	O	0	0	0
3.2	548	0	0	0	0	0	0	Q
3.3	561	0	0	0	0	0	0	0
3.4	574	0	0	0	0	0	0	0
3.5	580	0	0	0	0	0	0	0
3.6	572	0	0	0	0	0	0	0
3.7	562	0	0	0	0	0	0	0
3.8	549	0	0	0	0	0	0	0
3.9	533	0	0	0	0	0	0	0
4	537 547	0	0	0	0	0	0	0
4.1	563 500	0	0	0	0	0	0	
4.2	592 435	0	0	0	0	0	0	0
4.3	625	0	0	0	0	0	0 0	0
4.4 4.5	661 681	0	0	0	0	0	0	Ö
4.6	689	0	0	0	0	0	0	Ô
4.7	688	0	0	0	0	0	0	Ö
4.8	688	o o	0	0	0	0	0	Ô
4.9	689	0	0	0	Ö	Ö	Ö	Ö
5	690	0	0	0	0	0	0	Ö
∪	07V	•	V	V	V	v	V.	•

EXHIBIT E-4 FIGURE 2 HARRISON COUNTY BROADCASTING COMPANY TABULATION OF SUPPLEMENTAL RADIAL (continued)

DIST	68	0	0	0	0	0	0	٥
5.1	693	0	0	0	O	0	0	0
5.2	696	O	O	O	0	0	0	O
5.3	700	0	0	Q	0	0	0	0
5.4	706	Ó	0	0	0	0	0	O
5.5	712	Ó	0	O	0	0	0	0
5.6	718	0	0	О	O	0	0	0
5.7	726	0	0	0	0	0	0	0
5.8	735	0	O	0	O	0	O	O
5.9	744	0	0	0	0	0	0	0
6	749	0	0	0	0	O	0	0
6.1	753	0	0	O	O	0	0	0
4.2	752	0	O	O	0	0	O	Q
6.3	748	0	0	0	0	0	0	0
6.4	743	O	O	O	O	0	O.	0
6.5	742	O	0	0	O	0	O	0
6.6	743	O	O	O	0	0	0	0
5.7	746	0	0	O	0	0	0	0
4.8	750	0	0	0	0	0	0	0
6.9	755	0	0	0	0	0	0	0
7	755	0	0	0	0	0	0	0
7.1	755	0	Ó	0	0	0	0	0
7.2	755	0	0	0	0	0	0	0
7.3	755 755	0	0	0	0	0	0	0
7.4 7.5	755 755	0	0	0	0	0	0	Ö
7.5 7.6	755 755	0	0	Ö	0	0	0	ő
7.7	753 7 5 4	0	0	0	Ö	o o	Ö	ŏ
7.8	754	ŏ	ő	ŏ	ŏ	ŏ	ŏ	ŏ
7.9	757	ŏ	Ö	ŏ	Õ	ŏ	Ö	ō
8	764	Ö	Ŏ	ŏ *	ŏ	ŏ	Ö	ō
8.1	771	ō	Ō	ō	ō	ō	Ō	0
8.2	777	ō	ō	Ó	ō	ō	o	0
8.3	784	0	0	0	0	0	0	0
8.4	787	0	Q	Q	0	0	0	0
8.5	787	0	0	0	0	0	0	0
8.6	787	0	0	O	0	0	0	0
8.7	787	0	0	0	O	0	0	0
8.8	787	0	0	Q	O	O	Q	O
8.9	787	0	0	0	0	0	0	0
9	786	0	0	О	O	0	O	0
9.1	786	0	0	O	0	0	0	0
9.2	787	0	0	O	O	O	0	0
9.3	787	0	0	0	0	0	0	0
9.4	792	0	0	0	0	0	0	0
9.5	799	0	0	0	0	0	0	0
9.6	806	0	0	0	0	0	0	0
9.7 9.8	812	0	0	0	0	0	0	0
7.8 9.9	819 826	0	0	0	0	0	0	0
10	833	0	0	0	0	0 0	0	0
4.07		V.	~	C)	Q.	U	Ç	v

EXHIBIT E-4 FIGURE 3 HARRISON COUNTY BROADCASTING COMPANY TERRAIN PROFILE GRAPHS

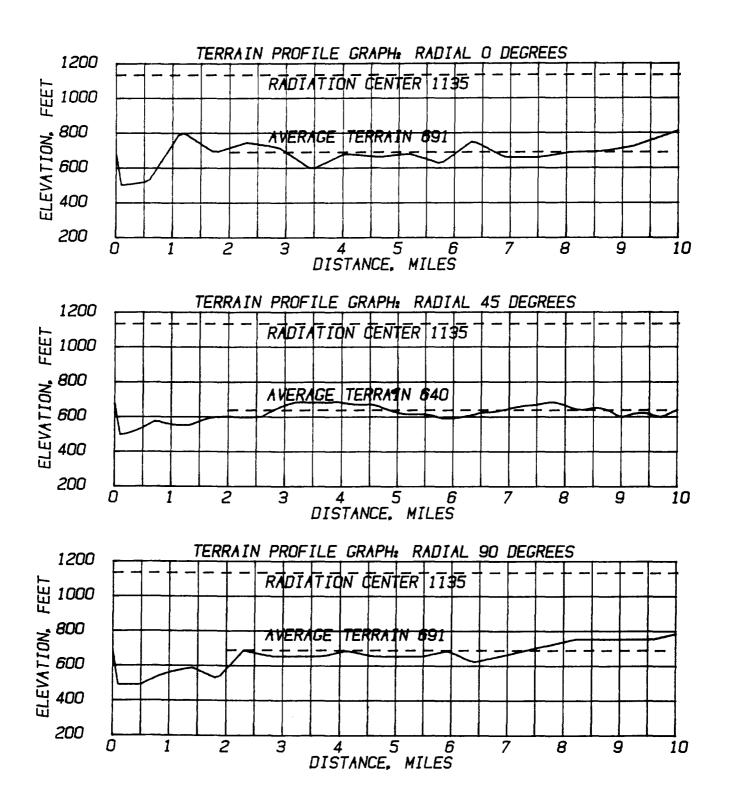


EXHIBIT E-4 FIGURE 4 HARRISON COUNTY BROADCASTING COMPANY TERRAIN PROFILE GRAPHS

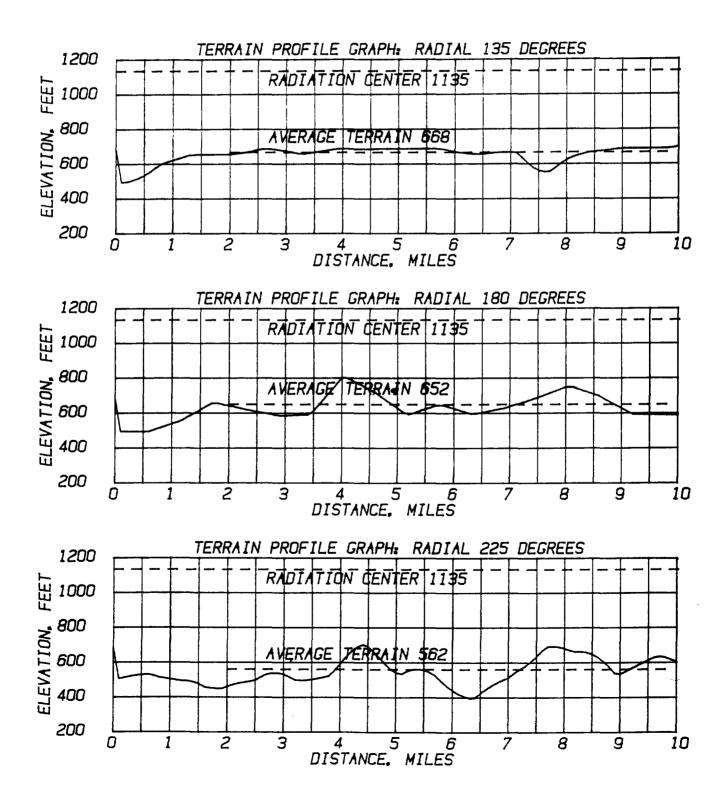


EXHIBIT E-4 FIGURE 5 HARRISON COUNTY BROADCASTING COMPANY TERRAIN PROFILE GRAPHS

